

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA

IN THE MATTER OF)	
)	
THE EXTRADITION OF)	Case No. 7:19-MJ-51
)	
ROBERT KOVAČIĆ)	

RESPONSE TO MOTION FOR BOND DUE TO NEW “SPECIAL CIRCUMSTANCES”

Robert KOVAČIĆ has filed a motion seeking bond based upon his proffer of new “special circumstances” justifying his release. Specifically, he has filed a document purportedly from the Cantonal Court of Novi Travnik in Bosnia and Herzegovina decreeing “Cessation of Imprisonment” based upon the Cantonal Prosecutor’s request to drop the proceedings in that country due to insufficient evidence.

The United States Attorney’s Office was first notified by defense counsel of this development yesterday morning, but nothing formal was received with that notice. Nevertheless, we immediately notified the Department of Justice and asked them to contact the Bosnian officials for confirmation. We received the formal documents and translation attached to the defense motion today at 10:58 a.m.

The government understands the urgency of the situation but cannot file a meaningful response unless and until it receives verification of the information provided by defense counsel. Accordingly, the United States asks that the court allow the government until Friday, September 13, 2019 to investigate the document before conducting a hearing on the motion.

Dated: September 11, 2019

Respectfully submitted,

THOMAS T. CULLEN
United States Attorney

By: /s/ Anthony P. Giorno
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **RESPONSE TO MOTION FOR BOND DUE TO NEW "SPECIAL CIRCUMSTANCES"** has been electronically filed by CM/ECF system which will send notification of such filing to all counsel of record on this 11th day of September, 2019.

/s/ Anthony P. Giorno
Assistant United States Attorney